

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

IN RE:)	
)	
INNOVATION STUDIO, INC.)	CASE NO. 25-10712-CJP
)	CHAPTER 7
DEBTOR)	
)	

**APPLICATION OF CHAPTER 7 TRUSTEE TO EMPLOY
NICHOLSON DEVINE LLC AS COUNSEL**

John O. Desmond, the chapter 7 trustee (“Trustee”) in the case of Innovation Studio, Inc. (“Debtor”), requests this Court enter an Order authorizing the employment of Nicholson Devine LLC as counsel to the Trustee. In support hereof, the Trustee states:

1. On April 8, 2025, the Debtor filed a voluntary petition under Chapter 7 of the Bankruptcy Code. Shortly thereafter, John O. Desmond accepted the appointment as the Trustee in the Debtor’s case.

2. The Debtor’s § 341 is scheduled to take place on May 6, 2025, at 10:30 a.m.

3. The Trustee finds it necessary and seeks to employ Nicholson Devine LLC to act as counsel for the Trustee in all bankruptcy-related matters, including but not limited to the following:

- (a) To assist the Trustee in the collection and administration of assets of the estate including filing any and all necessary pleadings and attending any hearings before the Court;
- (b) To litigate, if necessary, any claims which the Trustee determines to be disputed, unenforceable or otherwise merits disposition by the Court;

(c) To prepare and file, if necessary, the legal documents to conduct a public auction and/or private sale of the Debtor's assets and to attend any hearing in connection therewith.

(d) To perform any and all other bankruptcy related legal services for the benefit of the Trustee and the bankruptcy estate.

4. It is necessary for the Trustee to employ an attorney to perform such professional services.

5. To the best of the Trustee's knowledge, Nicholson Devine LLC does not represent any interest adverse to the estate in matters upon which it is to be employed and is a "disinterested person" as that term is defined in 11 U.S.C. § 101(14) as it applies to § 327.

6. Any and all prior representations of any entity in this case have been disclosed and are set forth in the Affidavit of Kate E. Nicholson filed herewith.

7. To the best of the Trustee's knowledge, Nicholson Devine LLC has no connection with the Debtor, the Debtor's creditors, or other parties in interest, their respective attorneys and accountants, except as disclosed in the Affidavit of Kate E. Nicholson, attached.

8. Nicholson Devine LLC has not received a retainer from any source whatsoever.

WHEREFORE, the Trustee requests this Court authorize the employment of Nicholson Devine LLC as counsel to the Trustee on a general retainer and grant such further relief as is deemed just.

Respectfully submitted,
**John O. Desmond, Chapter 7 Trustee of
the Estate of Innovation Studio, Inc.**
by his counsel,

/s/ Kate E. Nicholson

Kate E. Nicholson (BBO# 674842)
Angelina M. Savoia (BBO# 715690)
Nicholson Devine LLC
21 Bishop Allen Dr.
Cambridge, MA 02139
(857) 600-0508
kate@nicholsondevine.com

Dated: April 14, 2025

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

_____)	
IN RE:)	
)	
INNOVATION STUDIO, INC.)	CASE NO. 25-10712-CJP
)	CHAPTER 7
DEBTOR)	
_____)	

CERTIFICATE OF SERVICE

I, Kate E. Nicholson, certify that I have sent a copy of this **Application of Chapter 7 Trustee to Employ Nicholson Devine LLC as Counsel** via first-class mail, postage prepaid, to the parties on the attached list who do not receive electronic notice via ECF.

Dated: April 14, 2025

/s/ Kate E. Nicholson
Kate E. Nicholson (BBO# 674842)
Nicholson Devine LLC
21 Bishop Allen Drive
Cambridge, MA 02139
(857) 600-0508
kate@nicholsondevine.com

Electronic Mail Notice List

The following is the list of **parties and attorneys** who are currently on the list to receive email notice/service for this case.

- **John O. Desmond** trustee@jdesmond.com, jdesmond@ecf.axosfs.com
- **Richard King - B** USTPRegion01.BO.ECF@USDOJ.GOV
- **John F. Sommerstein** jfsommer@aol.com, r43822@notify.bestcase.com

Manual Notice List

None.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

IN RE:

INNOVATION STUDIO, INC.

DEBTOR

CASE NO. 25-10712-CJP
CHAPTER 7

**AFFIDAVIT OF KATE E. NICHOLSON IN SUPPORT OF
TRUSTEE'S APPLICATION TO EMPLOY COUNSEL**

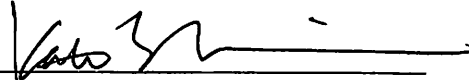
I, Kate E. Nicholson, being duly sworn, deposes and says:

1. I am a member of the bar of this Court. I am a partner at Nicholson Devine LLC at 21 Bishop Allen Drive, Cambridge, MA 02139 and have been practicing law since 2009.
2. My connections with the Debtor, any creditor, or other party in interest, their respective attorneys and accountants are as follows:
 - a. I have represented and continue to represent John O. Desmond, Chapter 7 Trustee, in several other unrelated bankruptcy cases;
 - b. Christine Devine, a partner at Nicholson Devine LLC, has represented and continues to represent John O. Desmond, Chapter 7 Trustee, in several other unrelated bankruptcy cases; and
 - c. Nicholson Devine LLC and its partners may have represented, or may represent, various creditors of the Debtor (and may represent other parties-in-interest) in matters unrelated to the Debtor. I have identified no current representation of any party-in-interest in this case other than as set forth in this Affidavit.
3. I and each member of my firm is a “disinterested person” as that term is defined in 11 U.S.C. § 101(14).
4. I have not agreed to share with any person (except members of my firm) the compensation to be paid for the services rendered in this case, except as follows: None.
5. I have not received a retainer in this case.
6. I shall amend this statement immediately upon my learning that (A) any of the

within representations are incorrect or (B) there is any change of circumstances relating thereto.

7. I have reviewed the provisions of MLBR 2016-1.

I certify under the penalty of perjury that the foregoing is true and correct.



Kate E. Nicholson (BBO# 674842)
Nicholson Devine LLC
21 Bishop Allen Drive
Cambridge, MA 02139
(857) 600-0508
kate@nicholsondevine.com

Dated: April 14, 2025

OLF 7 (Official Local Form 7)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In re Innovation Studio, Inc.

Case No. 25-10712-CJP

Chapter 7

Debtor

DECLARATION RE: ELECTRONIC FILING

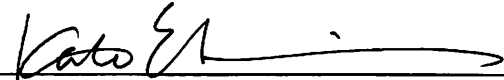
PART I - DECLARATION

I[We] Kate E. Nicholson and _____

_____, hereby declare(s) under penalty of perjury that all of the information contained in my Affidavit in Support of Application to Employ Counsel (singly or jointly the "Document"), filed electronically, is true and correct. I understand that this DECLARATION is to be filed with the Clerk of Court electronically concurrently with the electronic filing of the Document. I understand that failure to file this DECLARATION may cause the Document to be struck and any request contained or relying thereon to be denied, without further notice.

I further understand that, pursuant to the Massachusetts Electronic Filing Local Rule (MEFR) 7(b), all paper documents containing original signatures executed under the penalties of perjury and filed electronically with the Court are the property of the bankruptcy estate and shall be maintained by the authorized CM/ECF Registered User for a period of five (5) years after the closing of this case.

Dated: April 14 , 2025


(Affiant)

(Joint Affiant)

PART II - DECLARATION OF ATTORNEY (IF AFFIANT IS REPRESENTED BY COUNSEL)

I certify that the affiant(s) signed this form before I submitted the Document, I gave the affiant(s) a copy of the Document and this DECLARATION, and I have followed all other electronic filing requirements currently established by local rule and standing order. This DECLARATION is based on all information of which I have knowledge and my signature below constitutes my certification of the foregoing under Fed. R. Bankr. P. 9011. I have reviewed and will comply with the provisions of MEFR 7.

Dated:

Signed: _____
(Attorney for Affiant - /s/used by Registered ECF Users Only)